

**EXHIBIT “B”**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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JERALD BATOFF,

Plaintiff,

Civil Action No

v.

JULIE CHARBONNEAU and  
DEAN TOPOLINSKI

Defendants.

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**AFFIDAVIT OF LOUIS GAHAGAN**

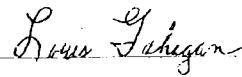
Louis Gahagan, being sworn, deposes and says:

1. I, Lou Gahagan, am a resident of the State of Pennsylvania and I am a certified fire investigator.
2. Attached hereto is a true and correct copy of my curriculum vitae.
3. I was retained by Jerald Batoff to investigate the origin and cause of the fire which occurred at 200 South Ithan Avenue, Villanova, Pennsylvania.
4. Following the fire, I conducted a fire origin and cause investigation at 200 South Ithan Avenue, Villanova, Pennsylvania.

5. During the inspection of the residence at 200 South Ithan, I observed wiring in the basement that had noticeable arcing on both sides of the wire and the wires had a separation of approximately an inch between the two ends of the arced wires ("Arced Wires").

6. In my opinion, the fire's origin was at or just above the Arced Wires.

7. This opinion is expressed within a reasonable degree of scientific and engineering certainty.



Louis Gahagan

Sworn to before me this  
\_\_\_\_ day of \_\_\_\_\_, 2012.

Notary Public

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**PATRICK J. MCGINLEY ASSOC., INC.**

**FIRE & CODE CONSULTANTS**  
Post Office Box 358  
Lafayette Hill, PA 19444

Telephone 1-610-940-0541

Fax 1-610-940-0545

**LOUIS H. GAHAGAN - CURRICULUM VITAE**

**EXPERIENCE**

**PHILADELPHIA FIRE DEPARTMENT**

Over seventeen years in fire service  
years as an officer and over five  
investigative position.

1987 - Present

**INVESTIGATOR - PATRICK J. MCGINLEY**

1982 - 1987

**ASSISTANT FIRE MARSHAL - CITY OF PH**

Investigate the cause, origin and c  
fires occurring in the City of  
responsible for investigating multi  
fire related deaths, and severe  
injuries; explosions, hazardous mate  
train fire fighting officers in fir  
techniques.

1978 - 1982

**LIEUTENANT - CITY OF PHILADELPHIA**

Responsible for activities of fire platoon;  
directed platoon en route to fires and took charge  
until relieved by superior officer; investigated  
fires responded to; conducted drills and instructed  
personnel in fire fighting techniques.

1970 - 1978

**FIRE FIGHTER - CITY OF PHILADELPHIA**

Participated in fire fighting activities under the  
direction of superiors.

**EDUCATION**

Community College of Philadelphia - AAS Fire Science, Graduated 1987

State University of New York - Currently attending and working toward  
Baccalaureate Degree in Fire Science.

**SPECIALIZED TRAINING**

Lehigh and Northampton County Fire Investigation Training Association,  
Pennsylvania State Police Troop "M" Fire Marshal Division - Annual  
Seminar for the Fire Investigator - Eighteen (18) Hours of Instruction  
(Tested) (2007)

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Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Annual Seminar for the Fire Investigator - (Tested) (2006)

Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Annual Seminar for the Fire Investigator - Eighteen (18) Hours of Instruction (Tested) (2005)

Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Annual Seminar for the Fire Investigator - Twenty-one (21) Hours of Instruction (Tested) (2004)

Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Annual 2003 Seminar for the Fire Investigator - Fifteen (15) Hours of Instruction (Tested) (2003)

Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Annual 2002 Seminar for the Fire Investigator - Twenty-four (24) Hours of Instruction (Tested) (2002)

Lehigh and Northampton County Fire Investigation Training Association, Pennsylvania State Police Troop "M" Fire Marshal Division - Investigative Procedures for the Fire Investigator - Twenty (20) Hours of Instruction (Tested) (2001)

Lehigh and Northampton County Fire Investigation Training Association - Pennsylvania State Police Troop "M" Fire Marshal Division - Investigative Procedures for the Fire Investigator - Thirty (30) Hours of Instruction (Tested) (2000)

Lehigh and Northampton County Fire Investigation Training Association - Pennsylvania State Police Troop "M" Fire Marshal Division - Investigative Procedures for the Fire Investigator - Thirty (30) Hours of Instruction (Tested) (1999)

Investigation of Vehicle Fires - Lee S. Cole and Associates, Chicago, IL (1998)

Montgomery County Fire Academy - Electrical Fire Investigation - Two Day Seminar Certificate (1992)

  
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National Association of Fire Investigators - Determine Cause and Origin of fires and explosions, 1990

Montgomery County Fire Academy - Arson Investigation - Four Day Seminar Certificate (1988)

National Fire Academy - Hazardous-Materials Incident Analysis (1987)

University of Delaware - Electric: Source of Ignition Certificate (1987)

Philadelphia Fire Department - Juvenile Fire Setters Certificate (1987)

Federal Bureau of Investigation - Inter-county Detective School Certificate (1986)

Federal Bureau of Investigation - Arson Investigation Certificate (1986)

Colorado Fire Marshal's Office - Advanced Arson Seminar Certificate (1985)

U.S. Consumer Product Safety Commission Certificate - Electrical Fires and Building Construction (1984)

Bureau of Alcohol, Tobacco and Firearms -  
Bomb Scene Investigation (1984)  
Arson Symposium (1987)

Pennsylvania State University - Fire Investigation Seminar Certificate (1984)

U.S. Department of Justice, Federal Bureau of Investigation & Federal Aviation Administration - Crisis Hijack Management (1983)

National Fire Academy - Certificate in Fire/Arson Investigation (1982)

Community College of Philadelphia - Associate Degree in Fire Science (1982 - 1987)

Temple University - Engineering Program, Thirty-six credit hours (1965 - 1969)

Spring Garden Institute - Certificate in Engineering/Drafting (1962 - 1965)



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TEACHING EXPERIENCE

National Institute of Trial Advocacy - Expert witness for mock trial presentations for practicing attorneys, University of Pennsylvania Law School, (1984 - 1987)

Temple University - Criminal Justice Course, (1984 - 1987)

Cape May County Fire School -  
Fire and Investigation (1983, 1985)  
Fire Prevention (1985)  
Strategy and Tactics (1985)

Developed the Fire Investigation and Arson Course presently being offered at the Community College of Philadelphia (1996) and the Bucks County Community College (1999)

Community College of Philadelphia Fire Investigation and Arson Course, (1998)

Community College of Philadelphia Fire Investigation and Arson Course, (2000)

PROFESSIONAL MEMBERSHIPS

Philadelphia Fire Officers Association

Pennsylvania Association of Arson Investigators

International Association of Arson Investigators

National Fire Protection Association

Building Owners' and Code Administrators, Inc.

National Association of Fire Investigators

Community College of Philadelphia Fire Science Program Advisory Committee



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SPECIAL QUALIFICATIONS

Extensive experience in determining the cause and origin of accidental and deliberate fires.

Expert in determining the cause of explosions and chemical related disasters.

Expert witness in both civil and criminal cases before State and Federal District Courts.

Certified Fire and Explosion Investigator, Reg. No. 3354-343.

Member of the advisory committee of the Fire Science Program at the Community College of Philadelphia, 1994-2006.



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